bidders if access to the system failed? How elaborate must the security be to insure that others cannot tamper with one's bid? How much would such a system cost? Who would pay for the system? What disadvantage would be created for the "designated entities" by virtue of a system which poses a significant price tag just for access to the bidding? Reluctantly, therefore, SBC opposes the proposal of NTIA to create a nationwide electronic bidding system.[16]

D. Minimum Bids And Upfront Payments.

SBC pointed out in its Initial Comments that minimum bids are not necessary if the Commission adopts its proposal of an upfront payment deposit, which will have the effect of a minimum bid. This also obviates the necessity for the Commission to determine what an appropriate minimum bid should be by placing some external value on the market. *See Alliance For Fairness And Viable Opportunity* at p. 9. Given that multiple applications for the license are filed, the Commission can be assured that the value of the license is greater than the upfront payment. Additionally, declining to create a minimum bid eliminates the

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[16]What would happen to the electronic bidding system once the PCS licenses are auctioned? Surely the number of auctions will be significantly less after the initial licenses are granted. While the Commission does contemplate additional auctions for other types of services, such as cellular fill-in licenses and ESMR licenses, these applications will neither be as complex nor will they generate as large a number of licenses as PCS. Accordingly, interest in them individually can be expected to be significantly less than for the PCS auctions. The wisdom of investing substantial sums into such an elaborate system for what is likely to be a one-time occurrence seems doubtful.

legal uncertainty to whether that amount is an appropriate beginning point.

A number of parties, however, propose various concerns with the upfront payment. For example, BellSouth disliked the use of a cashier's check for the upfront payment. Palmer Communications urged the Commission to allow companies to present but not deposit the upfront payment. SBC submits that its proposal of requiring deposit of Treasury notes as a satisfaction of the upfront payment requirement solves both problems. As SBC discussed in its *Initial Comments*, use of Treasury notes allows the companies to retain all the benefits of their initial investment in the event that their bids are unsuccessful (which meets BellSouth's and Palmer's objections) but it has the added advantage of avoiding the kind of abuse that could occur by a plan which requires presentation but not deposit of the money in advance. *See* SBC at p. 38. It also eliminates complex accounting requirements, as the Commission would simply returns the Treasury notes to the unsuccessful bidders.

Up-front payments should be forfeited if the highest bidder's application is later rejected. Without this disincentive, speculation would be rampant. Consequently, SBC disagrees with the Association of Independent Designated Entities at page 7 that this proposal is draconian and opposes its suggestion that the deposit be returned is the winner is rejected.

E. Procedures For Auction.

Like many initial commentors, SBC supported the Commission's proposal that only short form applications be required and reviewed prior to the bidding process. *See, e.g.*, PacTel at page 5. SBC also supports CTIA's proposal that the long form application process be waived altogether. SBC does not object to a waiver of the letter perfect standard for the short form application, as CTIA urges. It seems unnecessarily limiting to apply the letter perfect standard to such an important license procedure.

F. Second Round Of Bidding.

If combinatorial bidding of any kind is allowed, and if it is to be done through the use of sealed bids, SBC strongly urges the Commission to allow a recourse round. Contrary to the suggestion of MCI, it is fundamentally unfair to deprive the bidders for individual licenses from having the same amount of information which the offerors of sealed, combined bids would have. MCI is unabashed in its support for this inequity in information flow, but the self-serving nature of the suggestion is so egregious as to discredit it. *See MCI* at p. 12. MCI provides no support for this suggestion and it should be abandoned.

III. MISCELLANEOUS ISSUES.

A. Eligibility To Bid On PCS Licenses.

SBC objects strongly to the Commission entertaining any of the proposed revisions to its PCS eligibility rules in this

proceeding. While eligibility to participate in auctions is technically within the purview of the Commission in this proceeding, it would be wholly inappropriate to use this docket to revisit decisions very recently made, particularly with regard to PCS. If commentors like MCI have objections to those eligibility rules, they should file (as Sprint intends to do) a Petition for Reconsideration in the docket in which the restrictions were announced.[17]

1. The FCC Has Already Decided That Cellular Carriers Are Eligible To Provide PCS.

With regard to MCI's position concerning the eligibility of cellular carriers to participate in PCS, the FCC clearly and unequivocally rejected MCI's view in its *Second Report and Order* in the PCS docket. *See* § III, D, paras. 97-106. In any event, MCI is simply wrong when it suggests that so-called "dominant" cellular carriers should not be allowed to participate in the development of PCS. MCI's definition of dominance in the cellular market, even assuming that such a term has meaning, has

[17]SBC agrees with Sprint that the Commission's cellular eligibility rules are unnecessarily narrow. Moreover, the Commission has overlooked establishing a PCS eligibility requirement for holders of ESMR licenses. If the Commission changes eligibility rules for PCS in this docket, it should clarify that the same eligibility restrictions apply to ESMR providers as to cellular providers. Such a conclusion is inevitable given the FCC's proposed treatment of ESMR as a commercial mobile radio service in GN Docket No. 93-252. In any event, however, the appropriate procedural vehicle for making such arguments should be used, i.e., a pleading in the docket in which the decision was made.

never been adopted by any court or by the Commission in any setting.[18]

2. MCI's Proposed Exclusion Of So-Called "Dominant" Cellular Carriers Is Contrary To Public Policy And Is Not Based On Any Facts Or Allegations Of Abuse Of Market Power.

Were the FCC to adopt a dominant/nondominant dichotomy for cellular providers (which SBC opposes), it is not likely to adopt such a distinction based on the "meat ax" approach of MCI. SBC has expressed significant disagreement with the legality and wisdom of the dominant/nondominant approach to regulating landline providers. Even the worst of such decisions, however, purported to rely upon an analysis of some kind of market power and not market share alone. Of course, market power simply cannot be predicated on mere market share, particularly a market share as small as 10%. Contrary to MCI's notion, moreover, national branding does not indicate market power. MCI does not

[18]The Commission has announced (erroneously) that all cellular carriers are "dominant" for purposes of its arbitrary "dominant/nondominant" regulatory scheme. *See In the Matter of Tariff Filing Requirements for Nondominant Common Carriers*, CC Docket No. 93-36, released February 19, 1993, p. 4, n.12. This enunciation was not based upon any evidentiary record, a point that SBC has made to the Commission repeatedly. *See* Comments of SBC in Response to *NPRM* issued in CC Docket No. 93-36 § III, pp. 12, 13; and Comments of SBMS filed in response to a Petition For Rulemaking filed by the CTIA and designated by the FCC as RM 8179. The Commission's procedures for applying dominant carrier regulation require that the Commission make an affirmative determination that a carrier is dominant, or else the nondominant regulation applies. In the case of cellular providers, the Commission has turned the procedure upside down. Regardless of the merit of such an enunciation, however, the determination appears to apply to all cellular carriers and not merely to a handful of successful ones, as MCI is urging herein.

explain how participation by multiple and vigorously competitive companies to create a national brand for a service with nationwide characteristics can constitute an exercise of market power. Geographically integrated licenses do not establish market power either. Rather, they are a tribute to the success of such carriers in creating a service territory which meets the needs of their customers.

Finally, it is both contrary to fact and simply ludicrous to assume (as does MCI) that one cellular carrier would favor another cellular carrier in a competitive bidding process just because each of them are members of a national branding association. To date, participating carriers have not been able to agree on the appropriate technical standard for digital cellular transmission (i.e., TDMA v. CDMA). Their cooperation in a more esoteric preferential bidding practice seems unlikely at best.

MCI argues that excluding some cellular carriers from PCS bidding is analogous to the Commission's eligibility rules for the award of cellular licenses. *MCI* at p. 5. The comparison, however, is totally flawed. In the cellular dual licensing approach, the Commission excluded local exchange carriers from cellular licenses in Band A because only the LECs had an opportunity to obtain a license in Band B. Neither local exchange companies nor cellular companies have a similar set aside for PCS.

3. Exclusion Of Cellular Carriers From PCS Would Not Be In The Public Interest.

Finally and most importantly, excluding cellular carriers from participation in the PCS market is simply poor public policy, as the Commission concludes in its *Second Report and Order* in the PCS docket. Cellular carriers are the most experienced in the nation in the provision of wireless services. They possess significant understanding of customer needs for mobile services and have made a substantial investment to increase the widespread geographic availability of wireless services. Excluding such experienced providers from a new wireless service cannot possibly achieve Congress' objectives of diversity, swift deployment, and innovation in PCS development. MCI's assumption that experienced wireless providers simply are devoid of ideas (*Initial Comments of MCI*, Attachment, § II B, "Eligibility Rules," pp. 8-13) ignores the significant innovations fostered by these carriers in the cellular market.

MCI's notion that the largest cellular providers should be barred from PCS service due to their perceived market power is wildly inconsistent with MCI's notion that nationwide PCS licenses should be granted.[19] An analogous and equally

[19]In any event, the Commission should not grant MCI's proposal that combinatorial bidding be allowed on BTAs to aggregate them into a nationwide license. Again, the self-serving nature of MCI's proposal is obvious: it simply wants six chances for the consortium it boldly announced to be able to purchase a nationwide license. As noted previously, the argument that PCS licenses should be national in scope is a collateral attack on the Commission's *Second Report and Order* in the PCS docket and therefore inappropriately placed in this proceeding.

disturbing proposal to limit eligibility was made by Cellular Service, Inc.[20] Cellular Service, Inc. proposes that a so-called "dominant" cellular carrier (which it defines as one serving a mere 5% of the nation's POPS) should be blocked from bidding on both the A block and the B block of all MTAs which encompass any of the cellular carriers MSAs and RSAs. Cellular Service, Inc.'s proposal suffers from all the same flaws as the MCI proposal to limit cellular eligibility. Certainly it cannot be asserted that 5% share of the national market creates the probability of market power, but the proposed rule would nonetheless disqualify a significant number of providers. *See* Appendix II, *Sprint Initial Comments*. Fundamentally, Cellular Service, Inc. seeks to limit unnaturally the development of PCS by forbidding the participation of cellular carriers, a notion which is completely contrary to the well-reasoned decision of the Commission in the PCS Order.

B. Eligibility to Bid on SMR Licenses.

Once again, SBC asserts that eligibility to participate in specific licenses should be considered in proceedings dedicated to eligibility, not in the competitive bidding analysis. Nonetheless, Geotek proposes that the Commission initially restrict eligibility to bid on 900 MHz SMR licenses to current SMR licensees. Geotek argues (see page 1) that such a

[20]Like the MCI proposal, because it is an attack on cellular eligibility rules adopted by the Commission in the PCS proceeding, it should be dismissed as a collateral attack on the Commission's Order.

limitation would allow the creation of a wide area SMR license. SBC does not oppose aggregation of wide area SMR licenses (though SBC contends that the Budget Reconciliation Act requires such carriers to be treated like cellular carriers). *See SBC's Comments* in PR Docket No. 93-144. Such aggregation can be encouraged even if these licenses are subject to auction, provided that eligibility is unfettered. The Commission should never allow its encouragement of infant competition to sidetrack its legislative responsibility to promote innovative and efficient use of the spectrum. The market should govern who ultimately becomes the provider of these services and therefore, consideration of restrictions on eligibility are inappropriate in the competitive bidding analysis. In any event, restrictions on eligibility can only stymie the rapid development of such licenses by eliminating well-financed and experienced potential providers.

C. Transfer Penalties.

The Commission's *NPRM* considers various alternatives for restrictions on transfers of licenses granted to designated entities. In its Initial Comments, SBC opposed the imposition of any penalties on transfer of licenses once they are granted. Many commenting parties oppose any restrictions on transfer of licenses, even those granted to designated entities. *See, e.g., Time Warner* at pp. 4-5, *APC* at p. 8, and *Nextel* at pp. 12-13. The possibility for abuse due to the setting aside of spectrum

for designated entities is an inherent limitation of set-asides which simply cannot be cured by transfer restrictions.

Also, restricting the transfer of such licenses to other designated entities needlessly limits the economic viability of the spectrum. For example, the suggestion by Bell Atlantic and AT&T that licenses granted to designated entities should be transferred only to another designated entity merely insures that the spectrum will not be put to its highest economic use. A similar response can be made to Sprint's proposal that license transfers to nondesignated entities be restricted for six years.[21] There is no economic or regulatory precedent to support the proposal proposed by both Sprint and AT&T that profits which otherwise would be realized by the designated entity pursuant to a transfer should go to the FCC.

SBC does support BellSouth's equitable proposal that if a designated entity uses an installment plan to pay for its license, those payments should be accelerated upon transfer of the license to an entity which does not qualify for designated entity treatment. This proposal will not diminish the economic value of the set-aside spectrum, but it will equalize its treatment as compared to other licenses.

D. PCS License Renewal Expectancy.

SBC objects to the notion that the renewal expectancy for PCS licenses should somehow be "higher" than that for

[21] *Also see American Wireless Communications, Corp.* (three year restriction) at p. 34 and *Corporate Technology Partners* (four year restriction) at p. 7.

cellular services. To be granted a renewal expectancy for a cellular license, the cellular carrier must satisfy strict criteria established by the Commission.[22] Similar criteria for PCS licenses would be both fair and reasonable. MCI's argument that auctioned spectrum is somehow more precious because one has paid a price for it ignores the reality of cellular service. Most cellular companies have expanded the number of markets served through acquisitions, subject to Commission approval. Again, MCI shows its self interest by always favoring the solution which will benefit its business plan.

IV. CONCLUSION

Before any final decision is announced in this case, the Commission should consider the interdependence of its decisions on individual issues. Many of SBC's Initial Comments and the comments in this reply attempted to address this issue of interdependency. In the final analysis, however, no one can know how the system will work until every detail has been decided. The very future of personal communications rests largely upon the

[22] *See Memorandum Opinion and Order on Reconsideration* in CC Docket 90-358, released April 9, 1993, *In the Matter of Amendment of Part 22 of the Commission's Rules Relating to License Renewals in the Domestic Public Cellular Radio Telecommunications Service.*

decisions rendered in this docket. SBC urges the Commission to consider focus on the Budget Act's goals of encouraging diversity and rapid deployment of services, as well as the Company's Initial and Reply Comments, when making those decisions.

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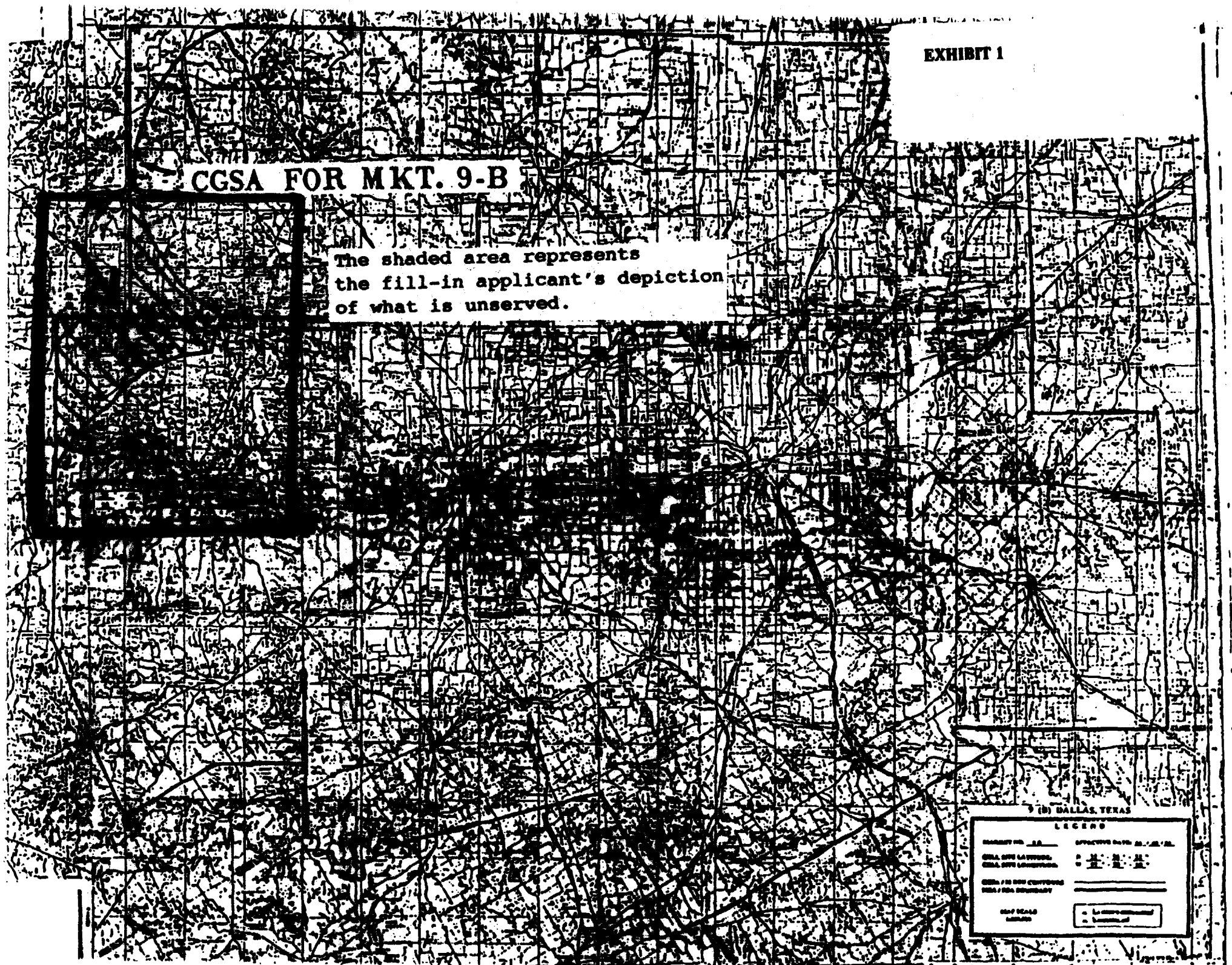
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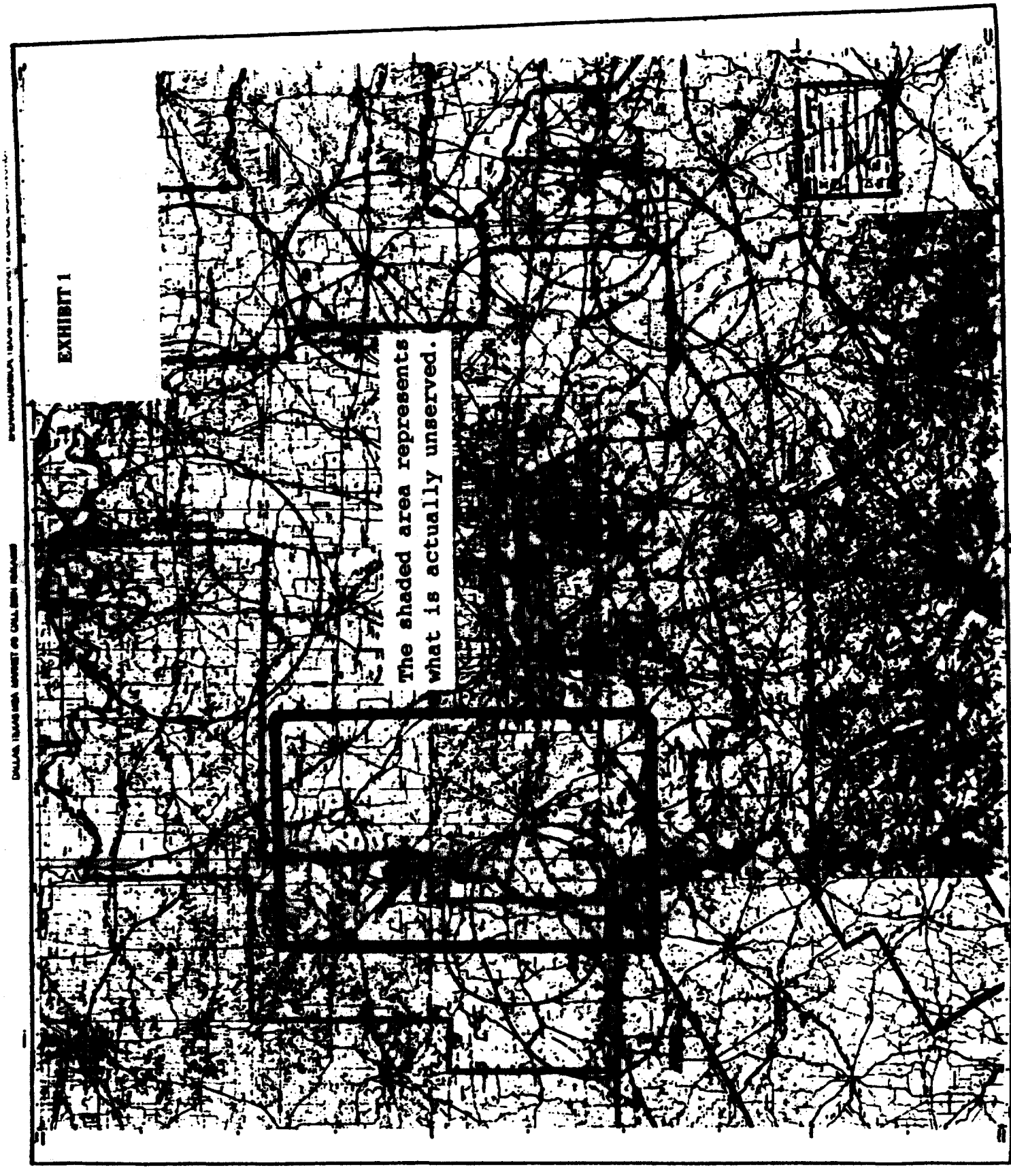

CERTIFICATE OF SERVICE

I, Paula J Fulks, hereby certify that copies of the foregoing Reply Comments of Southwestern Bell Corporation have been postage prepaid, on the parties listed on the attached.

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